

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JAGUAR CARS, A Division of the Ford)
Motor Company,)
)
Plaintiff,)
)
v.)
)
LEE IMPORTED CARS, INC.,)
)
Defendant/Third-Party Plaintiff,)
)
v.)
)
JOHN DOE,)
)
Being the Fictitious Name of)
Third-Party Defendant.)
_____)

Civ. No. 03CV12532RGS

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant to Local Rule 16.1, Plaintiff Jaguar Cars ("Jaguar") and Defendant Lee Imported Cars, Inc. ("Lee"), having conferred as required by Local Rule 16.1(B), hereby submit the following Local Rule 16.1(D) Joint Statement.

I. AGENDA FOR SCHEDULING CONFERENCE

The parties propose that the pre-trial matters set forth in Section III below be discussed during the scheduling conference.

II. INITIAL DISCLOSURE - RULE 26(a)(1) and LOCAL RULE 26.2

The parties have agreed that they will exchange required automatic disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before April 30, 2004. At this stage, the parties believe that the

number and type of discovery events set forth in Local Rule 26.1(C) are appropriate. This does not appear to be a case which would benefit from phased discovery.

III. PROPOSED PRE-TRIAL SCHEDULE

A proposed pre-trial schedule, including a joint discovery plan and proposed schedule for the filing of motions, is as follows:

EVENT	DATE
Fact discovery completed by:	December 14, 2004
Expert disclosures shall be made as required by Rule 26(a)(2) and Local Rules 16.5(C) and 26.4(A) by:	January 31, 2005
Rebuttal expert disclosures shall be made by:	February 28, 2005
Expert discovery to be completed by:	April 15, 2005
All dispositive motions, including those pursuant to Fed. R. Civ. P. 56, filed by:	May 16, 2005

The parties will be prepared for a final pretrial conference at a date convenient for the Court. All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion to the Court for good cause shown.

IV. MAGISTRATE JUDGE

The parties do not consent to trial by magistrate judge at this time.

V. SETTLEMENT

On February 27, 2004, Jaguar, through its counsel, made a written settlement proposal.

VI. LOCAL RULE 16.1(D)(3) CERTIFICATIONS

The Local Rule 16.1(D)(3) Certifications will be filed by the parties under separate cover.

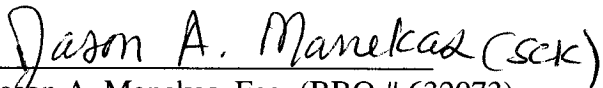
JAGUAR CARS, A DIVISION OF THE
FORD MOTOR COMPANY,

By its attorneys,



Sarah Kellogg (BBO # 637530)
KIRKPATRICK & LOCKHART LLP
75 State Street
Boston, Massachusetts 02109
(617) 261-3100

LEE IMPORTED CARS, INC.,
By its attorneys,



Jason A. Manekas, Esq. (BBO # 632073)
BERNKOPF, GOODMAN & BASEMAN LLP
125 Summer Street
Boston, Massachusetts 02110-1621
(617) 790-3000

Dated: March 2, 2004

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the
above document was served upon the attorney of
record for each party ~~by mail~~/by hand.

Dated: 3/3/04 